

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

BMW of North Charleston, LLC,)
and Riverland, LLC,)

Plaintiffs,)

vs.)

Quality Exteriors Group, LLC;)
Donnie Hawkins; and Drucker &)
Faulk, LLC,)

Defendants.)
_____)

Civil Action No. 2:18-cv-1872-RMG

PROPOSED DISCOVERY PLAN BY
DEFENDANTS, QUALITY
EXTERIORS GROUP, LLC, AND
DONNIE HAWKINS

Pursuant to Rule 26(f)(3), the defendants' proposed discovery plan is as follows:

Discovery Plan

- (A) **What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement of when initial disclosures were made or will be made;**

The parties have agreed to waive Fed.R.Civ.P. 26(a)(1) disclosures.

- (B) **The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused on particular issues;**

Discovery should be conducted on the facts alleged by Plaintiff, defenses asserted by Defendants, and issues of alleged damages. The parties have proposed a discovery deadline of May 24, 2019. Furthermore, the parties do not request that discovery should be conducted in phases or be limited to or focused on particular issues.

- (C) **Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced;**

None at this time.

- (D) **Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production – whether to ask the court to include their agreement in an order;**

None at this time.

- (E) **What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and**

The parties do not request any changes at this time.

- Any other orders that the court should issue under Rule 26(c) or under Rule 16(b) and (c).**

None at this time.

Respectfully submitted,

ROBINSON GRAY STEPP & LAFFITTE, L.L.C.

By: S / J. Michael Montgomery

J. Michael Montgomery

Fed. I.D. No. 10290

mmontgomery@robinsongray.com

Paul H. Hoefer

Fed. I.D. No. 10437

phoefer@robinsongray.com

Vordman Carlisle Traywick, III

Fed. I.D. No. 12483

ltraywick@robinsongray.com

1310 Gadsden Street

Post Office Box 11449

Columbia, South Carolina 29211

(803) 929-1400

Attorneys for Defendants, Quality Exteriors Group, LLC,
and Donnie Hawkins

Columbia, South Carolina

September 18, 2018